

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

INDICTMENT

Case No. _____

v.

Violations: 18 U.S.C. §§ 7, 13, 875(c),
879, 1361, and 1363; and N.D.C.C.
§§ 12.1-22-02(1), 12.1-22-02(2),
12.1-17-04, and 12.1-32-01

IAN PATRICK STEWART

COUNT ONE

**Burglary
(Fort Union Trading Post National Historic Site)
(Class C Felony)**

The Grand Jury Charges:

On or about May 13, 2025, in the District of North Dakota, within the Fort Union Trading Post National Historic Site and within the Special Maritime and Territorial Jurisdiction of the United States,

IAN PATRICK STEWART

did willfully enter a building and occupied structure, namely the Fort Union Trading Post National Historic Site, located in Williams County, North Dakota, when at the time the premises were not open to the public, IAN PATRICK STEWART was not licensed, invited, and otherwise privileged to enter the premises, and IAN PATRICK STEWART acted with the intent to commit a crime therein, namely:

- 1) Damage to Federal Government Property;
- 2) Terrorizing;

- 3) Malicious Mischief;
- 4) Interstate Threats;
- 5) Criminal Mischief; and
- 6) Disorderly Conduct;

and in effecting entry and while in the premises, IAN PATRICK STEWART, was armed with a firearm and other weapon, the possession of which under the circumstances, indicated an intent and readiness to inflict serious bodily injury;

In violation of Title 18, United States Code, Sections 7 and 13; and North Dakota Century Code, Sections 12.1-22-02(1), 12.1-22-02(2), and 12.1-32-01.

COUNT TWO

**Damage to Property of the United States
(Fort Union Trading Post National Historic Site)
(Class C Felony)**

The Grand Jury Further Charges:

On or about May 13, 2025, in the District of North Dakota, within the Fort Union Trading Post National Historic Site and within the Special Maritime and Territorial Jurisdiction of the United States,

IAN PATRICK STEWART

did willfully injure and commit a depredation against property of the United States, and attempt to willfully injure and commit a depredation against property of the United States, namely, the Fort Union Trading Post National Historic Site located in Williams County, North Dakota, and property located within the Fort Union Trading Post National Historic Site that was owned by the United States, and the aggregate amount of the damage and attempted damage exceeded the sum of \$1,000;

In violation of Title 18, United States Code, Sections 7 and 1361.

COUNT THREE

**Terrorizing
(Fort Union Trading Post National Historic Site)
(Class D Felony)**

The Grand Jury Further Charges:

On or about May 13, 2025, in the District of North Dakota, within the Fort Union Trading Post National Historic Site and within the Special Maritime and Territorial Jurisdiction of the United States,

IAN PATRICK STEWART,

with intent to place National Park Service employee (D.M.) and Williams County Sheriff's Office law enforcement in fear for their and another's safety, to cause evacuation of a building, and otherwise to cause serious disruption and public inconvenience and in reckless disregard of the risk of causing such terror, disruption, and inconvenience, did threaten to commit any crime of violence and act dangerous to human life against National Park Service employee (D.M.) and Williams County Sheriff's Office law enforcement;

In violation of Title 18, United States Code, Sections 7 and 13; and North Dakota Century Code, Sections 12.1-17-04 and 12.1-32-01.

COUNT FOUR

**Malicious Mischief
(Fort Union Trading Post National Historic Site)
(Class D Felony)**

The Grand Jury Further Charges:

On or about May 13, 2025, in the District of North Dakota, within the Fort Union Trading Post National Historic Site, and within the Special Maritime and Territorial Jurisdiction of the United States,

IAN PATRICK STEWART

did willfully and maliciously destroy and injure a structure, conveyance, and other real and personal property, and attempt to willfully and maliciously destroy and injure a structure, conveyance, and other real and personal property, namely, the real and personal property located within the Fort Union Trading Post National Historic Site located in Williams County, North Dakota;

In violation of Title 18, United States Code, Sections 7 and 1363.

COUNT FIVE

**Threatening to Kill a Former United States President
(Class D Felony)**

The Grand Jury Further Charges:

Between on or about April 20, 2025, and on or about May 13, 2025, in the District of North Dakota,

IAN PATRICK STEWART

did knowingly and willfully threaten to kill and inflict bodily harm upon a former President of the United States, namely, former United States President Barack Hussein Obama II;

In violation of Title 18, United States Code, Section 879.

COUNT SIX

**Threatening Interstate Communications
(Class D Felony)**

The Grand Jury Further Charges:

Between on or about May 5, 2025, and on or about May 13, 2025, in the District
of North Dakota,

IAN PATRICK STEWART

did knowingly and willfully transmit in interstate and foreign commerce email and
telephone communications containing threats to injure the person of another, namely,
Williston, North Dakota, resident T.O.;

In violation of Title 18, United States Code, Section 875(c).

COUNT SEVEN

**Threatening Interstate Communications
(Class D Felony)**

The Grand Jury Further Charges:

Between on or about May 5, 2025, and on or about May 13, 2025, in the District of North Dakota,

IAN PATRICK STEWART

did knowingly and willfully transmit in interstate and foreign commerce email and text message communications containing threats to injure the person of another, namely, Williston, North Dakota, resident T.C.;

In violation of Title 18, United States Code, Section 875(c).

COUNT EIGHT

**Threatening Interstate Communications
(Class D Felony)**

The Grand Jury Further Charges:

On or about May 5, 2025, in the District of North Dakota,

IAN PATRICK STEWART

did knowingly and willfully transmit in interstate and foreign commerce email communications containing threats to injure the person of another, namely, Williston, North Dakota, resident J.E.;

In violation of Title 18, United States Code, Section 875(c).

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Jennifer Klemetsrud Puhl
JENNIFER KLEMETSRUD PUHL
Acting United States Attorney

JJO/js